



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

August 11, 2010

Mr. Kent Coble  
Coble's Sandrock  
5833 Foster Store Road  
Liberty, NC 27982

Re: Alternate Source Demonstration – Iron and Manganese  
Coble's Sandrock Construction and Demolition Debris Landfill, Permit #01-05

Dear Mr. Coble,

The April 2010 monitoring event at the Coble's Sandrock Construction and Demolition Landfill documented the presence of iron and manganese at concentrations exceeding their respective 2L Standards. A re-sampling event was conducted on June 15, 2010 and iron and manganese concentrations were confirmed in groundwater samples collected from monitor wells MW-2, MW-4, and MW-7. Soil samples were also collected in the vicinity of monitor wells MW-2, MW-4, and MW-7 in addition to an upgradient sample. Based on the results, iron and manganese are present in native soils. An alternate source demonstration (ASD) was submitted to show that a transition to assessment monitoring is not necessary.

The Solid Waste Section has reviewed the 'Alternate Source Demonstration – Iron and Manganese Coble's Sandrock Construction and Demolition Debris Landfill' prepared by Joyce Engineering, Inc. (JEI). JEI concluded that the reported iron and manganese exceedances were not a result of impact from the landfill since the concentrations were not considered to be statistically significant increases over the calculated background levels, iron and manganese were detected at quantified concentrations in native soils, historical groundwater analytical data does not indicate a trend of organic or inorganic NC 2L and/or GWPS exceedances, and quantified concentrations of indicator parameters have not been detected in downgradient monitor wells.

Based on the evidence presented, the Solid Waste Section approves the ASD. Coble's Sandrock, Inc. is permitted to continue detection monitoring and future elevated Iron and Manganese concentrations will not require an ASD submittal.

Please contact me at 919-508-8516 or email at [ervin.lane@ncdenr.gov](mailto:ervin.lane@ncdenr.gov) if you have any questions or concerns regarding this correspondence. Thank you in advance for your anticipated cooperation in this matter.

Sincerely,

Ervin Lane  
Compliance Hydrogeologist  
Solid Waste Section

Cc: Jeremey J. Kerly, P.G., Joyce Engineering, Inc.  
Mark Poindexter, Field Operations Branch Supervisor  
Deb Aja, Western District Supervisor  
Charles Gerstell, Environmental Senior Specialist